



**BellSouth Telecommunications, Inc.**

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General Counsel

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November 3, 2000  
EXECUTIVE SECRETARY

**VIA HAND DELIVERY**

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: Complaint of AT&T  
Docket No. 00-00971

Dear Mr. Waddell:

This will serve as our response to this Complaint, dated October 20, 2000.

As background, AT&T initially raised this issue with its BellSouth Account Team on October 13, 2000, and BellSouth responded on October 23, 2000, a copy of which is attached as Exhibit 1. In addition, before BellSouth had responded to AT&T's initial inquiry, AT&T filed a complaint with the TRA's Consumer Services Division, which was sent to BellSouth on October 20, 2000. That same day AT&T filed an almost identical complaint with the TRA. In light of AT&T's decision to file the same complaint on two different occasions, this response will address both this complaint and the one filed with the Consumer Services Division.

Although not mentioned in AT&T's Complaint, BellSouth has been working with the TRA Staff and several other CLECs on this same matter for nearly a year. On October 3, 2000, BellSouth provided these CLECs with an update of plans to address the issue raised by AT&T in its Complaint. A copy of this letter is attached as Exhibit 2. Throughout this effort, BellSouth has offered an interim solution that will address AT&T's issue at no cost to AT&T or any other CLEC. AT&T has finally decided to avail itself of this interim solution, and as of October 27, 2000, customer name information for the customer referenced in this Complaint was available to customers subscribing to BellSouth's Caller ID-Deluxe.

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AT&T's characterization of the problem is not completely accurate. Specifically, the problem occurs with telephone numbers ported from BellSouth to a CLEC under Permanent Local Number Portability. When the CLEC customer calls a BellSouth customer who subscribes to BellSouth's Caller ID - Deluxe service, BellSouth performs a database query to obtain the caller's name information based on the first six digits (NPA-NXX) of the calling party's ported telephone number. This is referred to as 6-Digit Global Title Translation (6D-GTT). Although the calling party's telephone number has been ported from BellSouth, the NPA-NXX remains assigned to BellSouth, and therefore, the database query will be directed to BellSouth's database. Since the CLEC customer's 10-digit telephone number is not assigned to BellSouth, no customer name information is available unless the CLEC stores its customer information in BellSouth's CNAM database, and the information displayed to BellSouth's customer defaults to the calling number and the city and state where the NPA-NXX of the calling number is assigned. If the NPA-NXX of calling number is assigned to another service provider, then the 6D-GTT will direct the database query to the database designated by that service provider, provided that BellSouth has a contract with the appropriate party for these queries. Assuming that database is properly populated, BellSouth will be able to retrieve and display the calling party's information to the BellSouth customer.

To address this situation, the 6D-GTT process requires modification to a 10-digit Global Title Translation (10D-GTT). Under this arrangement, the database query is controlled by the entire 10-digit calling party number instead of the first six digits (NPA-NXX). However, even under this arrangement, it should be noted that service providers are not required to make their customers' name information available in any database, nor are service providers required to enter into contracts with all customer name databases. In both cases, the decisions are left to the individual service providers. For instance, until a few months ago, AT&T chose not to make its customers' name information available in any database.

Long before AT&T filed its complaint, BellSouth had begun efforts to deploy 10-Digit Global Title Translation (10D-GTT) in its network, and, pursuant to an agreement with the TRA staff, the initial deployment of this capability will be in Tennessee. Implementation of 10D-GTT is currently underway, and BellSouth estimates that deployment will be complete for all NPAs in Tennessee no later than April 6, 2001, with individual NPAs expected to be completed before that date. It is important to note that this project is a very complex undertaking, and that BellSouth has not actually performed Global Title Translations on this scale before.

Therefore, the completion date for Tennessee and elsewhere in the region represents BellSouth's best estimate based on current experience. Also, BellSouth has agreed to work with the industry on prioritization of NPAs within each state in the BellSouth region. As a result of earlier discussions with other CLECs, Time Warner agreed to coordinate that prioritization with the Southeastern Competitive Carriers Association (SECCA). However, no input has been received from Time Warner or SECCA to date.

Until 10D-GTT is actually deployed, BellSouth has made available an interim solution to address this situation. Under this interim solution, BellSouth agrees to store the names and numbers of a CLEC's customers in its database at no charge until the 10D-GTT capability is available. BellSouth manually loaded the information provided by AT&T for 22 numbers assigned to AT&T's customer into its database on October 27, 2000. BellSouth also provided AT&T with forms to initiate the interim solution on a mechanized basis on October 20, 2000, but AT&T has not yet returned the completed forms to BellSouth.

With regard to AT&T's letter of October 30, 2000, we wish to address the following specific points:

1. AT&T's letter includes e-mails from the TRA Staff. One such e-mail indicates "BellSouth has told us that they are working on the technical problem and should have it repaired when they install 3.0 version in their switches shortly after the first of the year." First, BellSouth would point out that nothing is broken and thus there is nothing to "repair"; the current system is working as it is designed to work. Second, BellSouth has never indicated that this issue is related to "3.0 version in our switches." We assume this reference is to Version 3.0 of the software supporting number portability and number pooling. However, this software has nothing to do with the matter described by AT&T.
2. AT&T indicates that BellSouth does not follow the current industry standards that purportedly require a 10-digit Global Title Translation. This statement is misleading in that there are no industry standards that require any service provider to perform a 10D-GTT for this purpose. No industry standard,

FCC order or other document requires the industry to implement this capability. As indicated above, the decision to implement 10D-GTT is a business decision left up to each individual service provider.

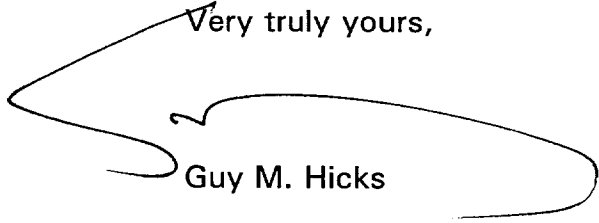
3. AT&T complains that "the department store has indicated to AT&T that if this problem is not corrected the department store it intends to change its local service back to BellSouth." However, on the date of AT&T's letter, October 30, 2000, AT&T was aware that BellSouth had manually loaded information for this customer into its database, again at no charge to AT&T, on October 27, 2000, and therefore this situation had been resolved before AT&T filed this Complaint.
4. AT&T states, ". . . even if this interim solution is successful for a single customer, the time and cost of the repeated interim solutions and the potential impact on subsequent competitive opportunities continues BellSouth's monopoly advantage." leaves the incorrect perception that BellSouth has only offered this interim solution for single customers. In fact, BellSouth has already provided AT&T with the information necessary to implement this mechanized data transfer so that all of AT&T's customer information can be stored in BellSouth's CNAM database. However, rather than take the steps necessary to implement such a transfer, AT&T has chosen instead to file duplicate complaints with the TRA.
5. Finally, AT&T alleges that BellSouth is in violation of an FCC LNP order which AT&T never specifically identifies. BellSouth strongly disagrees with this allegation and states that it is in complete compliance with all requirements of FCC orders related to Permanent Local Number Portability. In the Second Report and Order in CC Docket 95-116 (released 8/18/97) the FCC did adopt technical and operation standards and procedures recommended by the North American Numbering Council in its Local Number Portability Administration Selection Report dated April 25, 1997. These recommendations pertain to the NPAC-SMS Functional Requirements Specification, the

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NPAC-SMS Interoperable Interface Specifications, and NPAC-SMS Provisioning Process Flows. These areas do not address or include the technical requirements for the SCP; specifically it does not include or reference in any way the document that AT&T references in its complaint. The document that AT&T references ("Generic Requirement for SCP Application and GTT Function for Number Portability") was initially developed in an Illinois state task force during 1996 when they were developing Local Number Portability guidelines. The Georgia LNP Steering Committee, and eventually the Southeast Region, adopted the SCP requirement document as a guideline but this document was never adopted as a regulatory mandate. Further, repeated searches of Section 4.3 of this guideline have failed to uncover any statement indicating that a 10D-GTT must be performed for Caller ID - Deluxe service, as AT&T alleges.

To conclude, BellSouth has already responded to AT&T's concerns and has already addressed the specific customer situation referenced in AT&T's complaint. BellSouth's interim offer remains available and BellSouth will gladly continue to work with AT&T or any other CLEC to store their customer's information under this interim arrangement. BellSouth is working on the deployment of 10-D GTT capability in Tennessee and, in any event, BellSouth is in full compliance with all relevant FCC Orders on Permanent Local Number Portability. In short, AT&T's complaint is without merit and should be dismissed.

Very truly yours,



Guy M. Hicks

GMH/jem

Enclosure

**EXHIBIT 1**



**BellSouth Interconnection Services**  
Suite 200  
1980 West Exchange Place  
Tucker, GA 30084

**AT&T Regional Account Team**

770 492-7550  
Fax 770 492-9412

October 23, 2000

Ms. Denise Berger  
AT&T  
Room 12256  
1200 Peachtree St. NE  
Atlanta, GA 30309

Dear Denise:

This is in response to your e-mail dated October 13, 2000, regarding the Caller ID information delivered to end users when called by Dillard's department store, AT&T's local service customer, in Nashville, TN. Since AT&T ported Dillard's telephone numbers, when the store calls its customers with Caller ID service, the Dillard's store name is not displayed on end users' Caller ID units. Instead, Nashville, TN, and the store's telephone number are displayed.

Illuminet is incorrect when it stated, "as a matter of policy, BellSouth does not do a 10-digit look up for ported numbers." BellSouth's network is currently not capable of performing 10-digit Global Title Translation (10-D GTT). BellSouth currently performs a 6-digit GTT to obtain the calling party's information. In the case of AT&T's Nashville customer, the ported numbers are within an NXX assigned to BellSouth. Therefore, when the customer makes a call to a BellSouth subscriber, the Caller ID query is directed to the BellSouth CNAM database, since the NPA-NXX (615-662) is assigned to BellSouth. However, since the 10-digit calling number is assigned to AT&T, customer information for that number does not appear in BellSouth's database and the query returns only the city and state where the NPA-NXX is assigned. This same scenario occurs today when, for example, the calling party is a wireless customer or when no contract exists for queries to the database of the calling party's service provider. When AT&T's customer makes a call to another AT&T subscriber, AT&T performs the database query to its own database, maintained by Illuminet, and the calling customer's information is provided to the AT&T subscriber.

BellSouth has already initiated a project to implement 10D GTT for CNAM. Development and testing are underway with deployment scheduled to begin in early 2001 and is expected to complete by the end of 2001.

BellSouth would like to offer AT&T an interim solution to address the immediate need of providing all appropriate Caller ID information. If AT&T is interested, BellSouth will store the names and numbers of AT&T's customers in the CNAM database, at no charge, until 10D GTT for CNAM is implemented. The Account Team has already begun the preliminary steps to begin the temporary solution, should AT&T elect to accept this recommendation.

We regret the inconvenience this may have caused AT&T and its end user, Dillard's. I look forward to hearing from you that AT&T will work with BellSouth to implement the interim solution.

Sincerely,

  
Sandra Jones

cc: Greg Terry  
Jan Burriss  
Bob Bickerstaff



## **EXHIBIT 2**

**Bennett L. Ross**  
General Attorney

**BellSouth Telecommunications, Inc.**  
Legal Department - Suite 4300  
675 West Peachtree Street  
Atlanta, Georgia 30375-0001  
Telephone: 404-335-0793  
Facsimile: 404-658-9022

October 3, 2000

Dana Shaffer, Esquire  
XO Communications, Inc.  
105 Malloy Street, #100  
Nashville, TN 37201

Carolyn Marek, Esquire  
Time Warner Communications  
233 Bramerton Court  
Franklin, Tennessee 37069

Susan Berlin, Esquire  
MCI Worldcom, Inc.  
Six Concourse Pkwy, #3200  
Atlanta, GA 30328

Re: *CNAM Ten-Digit Global Title Translations Project*

Dear Dana, Susan, and Carolyn:

Consistent with our discussions on September 27, 2000, enclosed please find a timeline for the BellSouth CNAM Ten-Digit Global Title Translations Project. The timeline reflects the status of the work currently underway, and BellSouth intends to distribute an updated status report at the beginning of each month to keep your companies and the industry advised of the progress BellSouth is making in implementing Ten-Digit Global Title Translations across the BellSouth region.

There are three points that BellSouth would like to emphasize about the estimated completion dates reflected on the enclosed timeline. First, these estimates are based on BellSouth's best prediction of the time necessary to perform the work involved in this very complex undertaking given the other changes to the Service Transfer Points currently planned. BellSouth has not actually performed Global Title Translations on this scale in either the lab or the field, and BellSouth will have a much better idea of how long it will actually take to complete the work once the work is actually underway. In addition, BellSouth is evaluating various alternatives to expedite the translations process, which are not reflected in the enclosed timeline.

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Carolyn Marek, Esquire  
Susan Berlin, Esquire  
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Second, the timeframes reflected in the timeline represent the total time from start to finish for a given group of NPA/NXXs. There will not be a flash cut at the end of the interval, but instead individual NPA/NXXs will be turned up throughout the time period. In other words, for example, even though BellSouth currently estimates that all of the NPA/NXXs in the first group will be completed by April 6, 2001, Ten-Digit Global Title Translations in NPA 901, which is currently the first NPA on the schedule, should be implemented well before that date.

Finally, BellSouth has devised this timeline to implement Ten-Digit Global Title Translations first in Tennessee, as it has previously committed to do. However, BellSouth is willing to modify the order of the NPAs within Tennessee and the other states based upon the consensus of the industry. On our last conference call, you agreed to provide BellSouth with input from the Southeastern Competitive Carriers Association ("SECCA") as to SECCA's views as to the states in which Ten-Digit Global Title Translations should be implemented first. We also would appreciate SECCA's thoughts on the prioritization of NPAs within each state. Once this input is received, BellSouth will attempt to adjust the timeline accordingly. With that said, it should be noted that the groupings of NPA/NXXs are based on the way BellSouth's Service Control Points (SCPs) store names, and splitting a grouping into multiple parts may increase the time involved in implementing this project.

However, BellSouth welcomes your thoughts and suggestions. As we indicated on our last call, BellSouth is committed to completing this project as expeditiously as possible and to keeping the industry informed as to BellSouth's progress. We very much want this to be a cooperative effort and are willing to participate in regular conference calls to ensure adequate communications between the companies that have an interest in this project.

In that regard, we have scheduled a conference call for October 6, 2000 at 10:00 a.m. EDT to discuss this project. BellSouth will make arrangements for the call-in number.

Dana Shaffer, Esquire  
Carolyn Marek, Esquire  
Susan Berlin, Esquire  
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In the meantime, if you have any questions or need additional information,  
please do not hesitate to call Guy or me.

Very truly yours,

*Bennett L. Ross*  
Bennett L. Ross 

Enclosure

cc: Guy Hicks, Esquire  
Marcus Cathey  
George Grier

230806

**BellSouth CNAM  
Ten-Digit Global Title Translations (GTT)  
Project Timeline**

<u>Milestone</u>	<u>Completion Date</u>	<u>Status</u>
1. Development Complete – Service Management System (SMS)	10/31/00	On schedule
2. Development Complete – Service Control Points (SCP)	11/28/00	On schedule
3. Testing Complete – SMS	11/15/00	
4. System Release - SMS	11/16/00	
5. Testing Complete – SCP	01/27/01	
6. SCP Updates & GTT changes in Service Transfer Points (STP) made for NPAs 901, 931, 615, 423, 865, 731	04/06/01	
7. SCP Updates & GTT changes in STP made for NPAs 305, 561, 786, 954	05/04/01	
8. SCP Updates & GTT changes in STP made for NPAs 336, 704, 828, 910, 919, 803, 843, 864	06/22/01	
9. SCP Updates & GTT changes in STP made for NPAs 229, 404, 478, 678, 706, 770, 912	08/03/01	
10. SCP Updates & GTT changes in STP made for NPAs 205, 256, 334, 850, 225, 318, 337, 504, 228, 601, 622	10/12/01	
11. SCP Updates & GTT changes in STP made for NPAs 321, 352, 407, 904	11/02/01	
12. SCP Updates & GTT changes in STP made for NPAs 270, 502, 606, 859	11/23/01	

**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Gary L. Sharp  
AT&T  
414 Union Street, Suite 1830  
Nashville, Tennessee 37219

A handwritten signature in black ink, appearing to read "Gary L. Sharp", is written over a horizontal line. The signature is stylized with a large loop and a long horizontal stroke.